

UNITED STATES DISTRICT COURT
DISTRICT OF MASSACHUSETTS

NORTH AMERICAN SPECIALTY
INSURANCE COMPANY,

Plaintiff,

v.

MEDFORD ELECTRICAL
CONTRACTING CORPORATION, and
JOHN B. GIACALONE,

Defendants.

CIVIL ACTION NO. 04-11552 RGS

JOINT MOTION TO CONTINUE SCHEDULING CONFERENCE

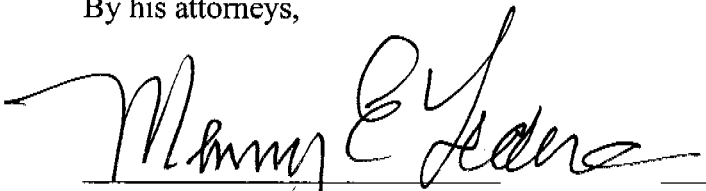
The parties move to continue the Scheduling Conference presently scheduled to take place on January 24, 2005, for a period of ninety (90) days. As grounds for this motion, the parties state:

- (1) They have entered into a Settlement Agreement which provides that Defendant Giacalone will take certain actions within the next ninety (90) days.
- (2) Provided Giacalone timely takes the actions described in the Settlement Agreement, this action will be dismissed.
- (3) Under the circumstances, preparing for and attending the settlement conference on January 24, 2005 would waste judicial time and force the parties to incur

legal fees which are likely to be unnecessary.

JOHN B. GIACALONE


By his attorneys,

 1/8/05

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NORTH AMERICAN SPECIALTY
INSURANCE COMPANY

By its attorneys,

 1/8/05

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